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Site: NEW BEDFORD
Break: 4.1
Other: 48581

October 22, 1985

Priscilla Chapman
Executive Director, New England Sierra Club
3 Joy Street
Room 12
Boston, MA 02108

Dear Ms. Chapman:

I would like to thank you for your comments on the Environmental Protection Agency's planned additional studies for the hot spot area of the Acushnet River Estuary. I hope I can clarify the purpose and scope of this next phase of study and address the Sierra Club's concerns regarding destruction technologies.

The planned studies to be conducted by the Corps of Engineers will, as you state, only focus on the engineering feasibility of dredging and disposal. However, these studies are only part of an overall Focused Feasibility Study on the hot spot to be conducted by the EPA. The results of the Corps' studies will be a large component of the Focused Feasibility Study, but the Agency will simultaneously be gathering new information on alternatives that do not involve dredging and disposal. I emphasize that EPA has not selected a preferred cleanup option.

The Agency is committed to actively pursuing any developments in the area of biodegradation or detoxification processes which may be applicable for New Bedford. New information gained by EPA and its contractor, NUS Corporation, will be incorporated into the Focused Feasibility Study. The Corps of Engineers will not be investigating destruction technologies as EPA has asked for their technical assistance and expertise speciffically in the area of dredging and disposal.

At present, the most promising biodegradation processes are not designed for in-situ treatment i.e. the contaminated sediments must be removed first and then treated. Therefore, the potential impacts of dredging are therefore also of concern in a possible destruction scenerio.

In particular, the Agency is pursuing a new biodegradation technology which could be applied to PCB contaminated sediments in a disposal site. This process was recently developed by Detox Industries, Inc. Sediment samples from the New Bedford hot spot area were sent to Detox for a laboratory treatability study and the initial feedback is encouraging.

The New Bedford Project Manager, Jackie Prince, is attending a PCB conference this week which will involve presentations on up and coming destruction technologies.

EPA plans to continue to pursue Detox and other destruction technologies independently of the Corps of Engineers' ongoing studies, as part of the Focused Feasibility Study.

If you have any questions feel free to contact Jackie Prince of my staff at 223-1951.

Sincerely,

Michael Deland

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October 17, 1985

Michael P. Deland, Administrator
Environmental Protection Agency, Region I
JFK Federal Building
Boston MA

Dear Mr. ~~Deland~~ Mike,

First, I would like to commend EPA for initiating these additional studies of the impacts of the proposed dredging and disposal alternatives for the PCB "hot-spots" in the Acushnet River.

However, I must also express great disappointment that these studies will be limited to the dredging and disposal options identified in the Feasibility Study. As you are aware, the Sierra Club commented on these options in 1984, and we stated that none of the options described offered an acceptable permanent cleanup solution that would insure the water quality of the river, New Bedford harbor, Buzzards Bay, and their environs in the future. All of the options, we felt, were sure-fire recipes for Superfund dumps of the future which our grandchildren or great-grandchildren will have to clean up.

Therefore we are urgently requesting you tonight to expand these proposed studies to include pilot tests of various PCB destruction technologies on samples of the highly contaminated sediments from the river. EPA's original RAMP on the New Bedford site listed possible destruction technologies in experimental or developmental stages which should be tried, including incineration, extraction procedures, biological treatment, and others. Conducting such tests as part of your further studies might even lead to significant technological breakthroughs which would benefit other PCB-Superfund sites as well as this one.

We call your attention to the recent effects of the heavy rain accompanying Hurricane Gloria on the Alton Mine superfund site in eastern Pennsylvania. At this site, EPA's "cleanup" solution was to plug up the holes in a tunnel where hazardous waste had formerly been dumped, adjacent to the Susquehanna River. During the recent storm, the "cleaned up" site started leaking and continues to leak toxic waste into the river.

We fear that EPA will propose another such faulty cleanup in the Acushnet River, either by choosing shore-side containment of the PCB-contaminated sediments or by choosing the hydraulic control/channelization technique. The Acushnet River and the people around it should not be burdened with this kind of eternal pollution. We hope you will consider expanding these studies as we have recommended.

Truly yours,
Priscilla Chapman
Priscilla Chapman Executive Director, New England Sierra Club